

EXHIBIT

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Freeman, Daniel (CRT)

From: Scott Field <Scott.Field@butlersnow.com>
Sent: Wednesday, July 6, 2022 5:06 PM
To: Freeman, Daniel (CRT)
Subject: [EXTERNAL] RE: LULAC v. Abbott (Redistricting): Deposition Dates

Dan, thanks for the heads up. Assuming you're able to get the court to extend the deadline for fact discovery and the court allows discovery from these witnesses, I'll be glad to work with you on dates for their depositions.

Putting those issues aside, the problem we have is existing travel schedules. Tom Bryan is out from July 10 through the end of the month on vacation. I am out of the country from July 18-28 on vacation, too. So, I think without my even checking further with them, we know the earliest we could do depositions is the first week of August.

Given that, my thought would be for you to take Adam Foltz's depo on the 14th and then see if you still need/want Tom and Eric's depositions. If you do, let me know and I can reach out to them to get early August dates that we can put a pin in and hold should the court allow the discovery. I have no problem figuring out dates with you as long as we can work around vacations.

Scott

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From: Freeman, Daniel (CRT) <Daniel.Freeman@usdoj.gov>
Sent: Wednesday, July 6, 2022 2:54 PM
To: Scott Field <Scott.Field@butlersnow.com>
Subject: LULAC v. Abbott (Redistricting): Deposition Dates

Scott,

I am reaching out regarding potential deposition dates for Thomas Bryan and Eric Wienckowski. We have not sought to take depositions of these individuals thus far, and we may not need to do so, depending on what we learn from Adam Foltz on July 14. We also recognize that resolution of our motion to enforce document subpoenas may impact our ability to depose them. However, we would appreciate if you could advise us of their availability for the remainder of the month.

Thanks very much,

Dan Freeman

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